

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DZHOKHAR TSARNAEV

No. 13-CR-10200-GAO

ASSENTED-TO MOTION FOR LEAVE TO FILE REPLY MEMORANDA

Defendant, by and through counsel, with the assent of the government, respectfully moves for leave to file a reply to the government's opposition to his Motion to Vacate Special Administrative Measures ("SAMs") [Dkt # 110] by November 4, 2013. As grounds therefor, undersigned counsel state that a reply will assist the Court to adjudicate matters at issue, including matters raised for the first time in the government's opposition (*e.g.*, the argument that the Court lacks jurisdiction based on the "exhaustion" doctrine).

In addition, defendant, by and through counsel, with the assent of the government, respectfully moves for leave to file a reply to the government's opposition to his Motion to Compel Discovery [Dkt # 112] by November 6, 2013. As grounds therefor, undersigned counsel state that a reply will assist the Court to adjudicate matters at issue, and additional time will permit the defense reply to be informed by at least a preliminary review of additional disclosures made by the government on October 21, 2013.

Respectfully submitted,

DZHOKHAR TSARNAEV
by his attorneys

/s/ William Fick

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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 25, 2013.

/s/ William W. Fick